

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DAVID HOUSE,)
)
Plaintiff,)
)
v.)
) Case No. 1:11-cv-10852-DJC
JANET NAPOLITANO *et al.*,)
)
Defendants.)
)

UNOPPOSED MOTION TO EXTEND TIME TO ANSWER

Defendants respectfully request that the Court grant them a brief extension of time in which to respond to the Complaint, until April 27, 2012. In support of their motion, Defendants state that this is a case arising under the First and Fourth Amendments relating to a search and detention of Plaintiff's electronic devices in November 2010. On March 28, 2012, the Court denied Defendants' motion to dismiss, or in the alternative, for summary judgment. Defendants' answer to the Complaint is currently due on April 11, 2012. Undersigned counsel will be out of the office from April 3-9, 2012. In addition, the Court entered a scheduling order on March 28, 2012, setting a Rule 16 conference. The requested extension will provide defense counsel with sufficient time to finalize the response to the Complaint, as well as to meet and confer with opposing counsel to discuss the issues related to the Rule 16 conference. Plaintiff does not oppose the requested extension.

WHEREFORE, Defendants request that this Motion be granted and the Court order that their response to the Complaint be due on or before April 27, 2012.

Dated: April 2, 2012

Respectfully Submitted,

STUART F. DELERY
Acting Assistant Attorney General

SANDRA M. SCHRAIBMAN
Assistant Branch Director

/s/Diane Kelleher
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants by First Class Mail.

Dated: April 2, 2012

/s/ Diane Kelleher
Diane Kelleher
Senior Trial Counsel

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1

Pursuant to Local Rule 7.1, the undersigned counsel certifies that on March 30, 2012, she conferred with counsel for Plaintiff regarding Defendants' request and that Plaintiff's counsel did not object to the motion and the requested relief.

Dated: April 2, 2012

/s/ Diane Kelleher
Diane Kelleher
Senior Trial Counsel